



VIA ECF

April 1, 2021

The Honorable Debra C. Freeman
 United States District Court
 Southern District of New York
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl Street
 New York, NY 10007-1312

Re: *Jane Doe 1, et al. v. Estate of Jeffrey Epstein*, 1:19-cv-07675-GBD
 Status Report

Dear Judge Freeman:

We represent the Plaintiffs in the above-referenced matter and write jointly on behalf of counsel for Defendants Darren K. Indyke and Richard D. Kahn, Co-Executors of the Estate of Jeffrey E. Epstein (“Defendants”), to inform the Court of the status of the case in accordance with the Court’s Order on September 4, 2020 (ECF #48).

As stated in the February 1, 2021, joint status report, Plaintiff Jane Doe 6 resolved her individual claims against the Estate through the Epstein Victims’ Compensation Program (“Program”) and voluntarily dismissed her individual claims with prejudice against Defendants on December 3, 2020.

Plaintiff Jane Doe 1 resolved her individual claims against the Estate through the Program and voluntarily dismissed her individual claims with prejudice against Defendants on January 6, 2021.

Through joint stipulation with Defendants, Plaintiffs filed a Fifth Amended Complaint on February 3, 2021, to add Jane Doe 8.

On January 29, 2021, the Program determined Jane Doe 3 was not eligible to receive compensation from the Program. Jane Doe 3 then submitted supplemental evidence in support and is awaiting a final determination on her claims.

On February 4, 2021, the EVCP’s Administrator announced that: “[D]ue to uncertainty about the liquidity of Estate assets to fund the Program, effective immediately, all compensation determination offers will be held until after the March 25, 2021 claims filing deadline or until such time that the Administrator has sufficient certainty that eligible claims can be timely and fully funded and paid. The Program will continue to accept claim filings, review claims, and hold meetings with claimants so that it will be prepared to resume the issuance of compensation determination offers as soon as practicable.”

Plaintiff Jane Doe 2 resolved her individual claims against the Estate through the Program and voluntarily dismissed her individual claims with prejudice on March 9, 2021.

On March 12, 2021, the EVCP's Administrator announced that the "Program will resume the issuance of compensation determination offers".

Plaintiffs Jane Does 3, 4, 5, 7, and 8 have submitted their claims and are waiting resolution.

All parties agree that this matter should remain stayed (in conjunction with this Court's order on January 3, 2020) pending Plaintiffs' participation in the Program.

Respectfully submitted,

Date: April 1, 2021

/s/ Arick Fudali
Arick Fudali
The Bloom Firm
Attorneys for Plaintiffs

Date: April 1, 2021

/s/ Bennet J. Moskowitz
Bennet J. Moskowitz
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